

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**In re:**

**LISA NGUYEN,**

**Debtor.**

**Chapter 13**

**Case No. 18-16367 (ELF)**

**CERTIFICATE OF NO RESPONSE**

The undersigned hereby certifies that, as of the date hereof, he has received no answer, objection, or other responsive pleading to the *Mark Knouse, Lynn Brinker, and Kim Beidler's Motion for In Rem Relief From the Automatic Stay Under §§ 105 and 362, Nunc Pro Tunc to October 29, 2018* (the "Motion") (D.I. No. 58), which was filed and served on January 24, 2019. The undersigned further certifies that he has reviewed the Court's docket in this case and no answer, objection, or other responsive pleading to the Motion appears thereon. Pursuant to the *Notice of Mark Knouse, Lynn Brinker, and Kim Beidler's Motion for In Rem Relief From the Automatic Stay Under §§ 105 and 362, Nunc Pro Tunc to October 29, 2018* (D.I. No. 59), any objections to the Motion were to be filed and served no later than February 7, 2019.

It is hereby respectfully requested that the Order attached to the Motion be entered at the earliest convenience of the Court.

**BIELLI & KLAUDER, LLC**

Date: February 18, 2019

/s/ Cory P. Stephenson  
Thomas D. Bielli, Esquire  
Cory P. Stephenson, Esquire  
1500 Walnut Street, Suite 900  
Philadelphia, PA 19102  
Telephone: 215-642-8271  
Facsimile: 215-754-4177  
tbielli@bk-legal.com  
cstephenson@bk-legal.com

*Counsel for Mark Knouse,  
Lynn Brinker, and Kim Beidler*